

UNITED STATES FEDERAL COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE:

BISASOR, ET AL

Bankruptcy Appeal

Case No. 1:15-cv-13813

FILED  
IN CLERK'S OFFICE  
JAN 20 2016  
PM 3 19  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**NOTICE OF INTENT TO FILE A RESPONSE TO MOTION TO WITHDRAW AND  
REQUEST FOR TIME TO FILE A RESPONSE AND TO FILE BY FAX**

I, Andre Bisasor, hereby request the following from this Honorable Court:

1. I would like to give notice of my intent to file a response to debtor's counsel (David G. Baker) motion to withdraw.
  - a. I was blindsided by Mr. Baker's recent filing and need time to put together a proper and effective response.
  - b. I am also attempting to find new counsel and to get advice on how to best respond in a way that is clear, concise and to the point as much as possible.
2. I would like to request time to respond.
  - a. Because I have to do this by myself on a pro se basis at this juncture, I need time to respond having only received notice on Tuesday January 19, 2016 right after the MLK holiday.
3. I also request permission to file papers by fax because:
  - a. I have to travel a great distance to come to court,
  - b. I am not a lawyer and have other obligations outside of court as a regular citizen and so it is tremendously prohibitive for me to have to come to court frequently and especially if I have to respond to time-sensitive filings by other parties. For instance, David Baker filed a motion to withdraw in the lower bankruptcy court on Jan 5, 2016 and it was approved by around 4pm on Jan 5, 2016 while I only received notice that day and by the time travelled to and arrived at court and filed a reply at around 4:30pm, Judge Feeney had already ruled on the motion, allowing it. This was a harm to me in that I was not afforded appropriate time to respond. If I was able to fax my papers, I could have been able to get in a reply before the ruling that same day.
  - c. Given that I have to proceed pro se at this juncture, it is unrealistic to expect that I can receive notice of a filing and respond in the same day while having to physically come to court to do so. While other parties can file electronically, pro se litigants are afforded no such privilege.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully Submitted,  
The Appellant,



Andre Bisasor  
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Dated: January 20, 2016